



MH

From: Matthew Hardin matthewdhardin@gmail.com
Subject: Re: ATTORNEYS EYES ONLY
Date: May 28, 2025 at 9:09 AM
To: Russell Greer russellgreer27@icloud.com

Good morning, Mr. Greer.

First, it is unethical to use the threat of police action to induce a settlement in a lawsuit. The tenth Circuit emphasized in *Hammond v. Bales*, 843 F.2d 1320, 1322 (10th Cir. 1988) that using criminal complaints as leverage to obtain a civil benefit is so egregious that it violates the Constitution. Indeed, threatening to take your documentation to the police if we do not accede to your settlement demands is very likely a crime in Utah. Utah Code Ann. § 76-6-406. If you believe you have evidence that Mr. Moon committed a crime, you should immediately take that evidence to the police regardless of whether your “settlement” offers are accepted or rejected. We would never want to hide any evidence from the police or discourage a full inquiry by any relevant prosecutorial authority.

Second, I have a professional duty to inform my client of all settlement demands, such that they cannot be marked “attorney’s eyes only.” Utah R. Prof. Cond. 1.4 *requires* me to promptly inform my client of your “settlement” offer below. Comment 2 to that rule emphasizes that “a lawyer who receives ... an offer of settlement in a civil controversy ... must promptly inform the client of its substance.”

Third, your email below indicates that you have not taken to heart the Court’s admonition that you should only designate eligible materials as “attorney’s eyes only.” Specifically, at ECF No. 272 at 4, the Court explained to you what type of information can be designated as “attorney’s eyes only.” Your “settlement” demands, including but not limited to your threats to report my client to the police, are clearly not the type of information that is eligible for protection as “attorney’s eyes only” pursuant to the Standard Protective Order.

Fourth, please consider this a demand, pursuant to pages 13-14 of the SPO, that you de-designate the email below as “Attorneys Eyes Only.” There is no reason to believe that any portion of your email transmits protected or protectable information, such as business or trade secrets. Pursuant to the SPO, if you fail to respond and/or fail to offer any valid explanation for how this email is “Attorneys Eyes Only” within seven days, it will be automatically de-designated. If you persist in your assertion that this email is “Attorneys Eyes Only,” we will file a formal motion to de-designate it, and will likely also seek sanctions against you for the frivolous and improper designation you made in the first instance.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

The information contained in this message may be privileged. It is intended by the sender to be confidential. If you suspect you may not be the intended recipient, please notify the sender and delete all copies.

On May 28, 2025, at 8:21 AM, Russell Greer <russellgreer27@icloud.com> wrote:

Sir,

[REDACTED]

This is marked attorneys eyes only because those kiwi farms losers don’t need to know about private email offers.